

HEATHER E. WILLIAMS, SBN 122664  
Federal Defender  
HOOTAN BAIGMOHAMMADI, SBN 279105  
Assistant Federal Defender  
Designated Counsel for Service  
801 I Street, Third Floor  
Sacramento, CA 95814  
T: (916) 498-5700  
F: (916) 498-5710

Attorneys for Defendant  
Joseph Paul Herrera Kinney

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:23-cr-318-TLN
Plaintiff,	)	
	)	<b>STIPULATION AND ORDER TO MODIFY</b>
	)	<b>CONDITIONS OF RELEASE</b>
vs.	)	
	)	Judge: Hon. Carolyn K. Delaney
JOSEPH PAUL HERRERA	)	
KINNEY,	)	
	)	
<u>Defendant.</u>	)	

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney Justin Lee, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Joseph Paul Herrera Kinney, that the amended special conditions of bond be modified as follows.

The parties specifically stipulate as follows:

1. Mr. Kinney is on pretrial release and his amended special conditions restrict him to home detention. ECF no. 30 at ¶ 16.
2. On June 15, 2024, from 1:00 p.m. to 9:00 p.m., Mr. Kinney's family will have a barbeque to celebrate his mother's and grandfather's birthdays. The celebration will occur at Mr. Kinney's grandmother's home located at 316 Arlington Court, Suisun City, California.

3. Mr. Kinney moves for special condition #16 to be amended to allow him to attend the barbeque. He specifically requests that home detention be lifted from 12:30 p.m. to 9:30 p.m. on June 15, 2024, and that he be allowed to travel to and from 316 Arlington Court, Suisun City, California during that time.
4. All other conditions will remain in place.
5. The government and pretrial services do not object to Mr. Kinney's motion.

Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

Date: June 11, 2024

/s/ Hootan Baigmohammadi  
HOOTAN BAIGMOHAMMADI  
Assistant Federal Defender  
Attorneys for Defendant  
Joseph Paul Herrera Kinney

Date: June 11, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ Justin Lee  
JUSTIN LEE  
Assistant United States Attorney  
Attorneys for Plaintiff

**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: June 11, 2024



---

CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE